UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

CHELSEA GILLIAM, ET AL.,

Plaintiff,

v.

Civil Action No. MJM-23-1047

DEPARTMENT OF PUBLIC SAFETY & CORRECTIONAL SERVICES, et al..

Defendants.

PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO POSTPONE SETTLEMENT CONFERENCE

Plaintiffs Chelsea Gilliam, Kennedy Holland, and Chloe Grey (collectively "Plaintiffs"), by and through their undersigned counsel, file this response to Defendants' Motion to Postpone Settlement Conference, respectfully requesting that this Court either deny Defendants' request to postpone the settlement conference or, in the alternative, reschedule the settlement conference for November or as soon as otherwise possible.

The Plaintiffs seek injunctive relief for serious civil rights violations. Ms. Grey remains in the custody of the Department of Public Safety and Correctional Services ("DPSCS"). Each day, she continues to suffer as a result of Defendants' failure to ensure her safety and provide the gender affirming care she needs. The injunctive relief sought in this action and through settlement is urgent.

The parties agreed to an October 8, 2025 settlement conference date six months ago—in early April 2025. The Court's Order Scheduling Settlement Conference, ECF No. 159, was issued on April 4, 2025, and required the parties to submit a letter to chambers "within one week of this letter" if they had a conflict with the October 8, 2025 date. Inexplicably, however,

Defendants waited more than five months after the April 4 order—just two weeks before the settlement conference—to inform the Court that they were not prepared to proceed with the settlement conference.

Discovery in this case began in March 2025. Plaintiffs served discovery requests on May 7, 2025. By contrast, Defendants did not serve discovery requests until September 23, 2025. Defendants' delay in providing responses and serving discovery requests should not delay the settlement process. Moreover, Plaintiffs provided their settlement demand nearly two months in advance of the scheduled settlement conference. Therefore, Plaintiffs respectfully request that this Court deny Defendants' request and require them to attend the scheduled settlement conference with individuals with decision-making authority who are prepared to respond substantively to Plaintiffs' settlement demand or, in the alternative, postpone the settlement conference to November or as soon as otherwise possible.

Respectfully submitted,

/s/ Jessica P. Weber

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